UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: Chapter 13

Edward Franklin Dabney and Angelea

Michelle Jones

Debtors

CASE No. 1:20-bk-00555-HWV

MOTION TO AUTHORIZE WAGE ATTACHMENT

COME NOW, the Debtor, Angelea Michelle Jones, by and through counsel, Dawn M. Cutaia, and respectfully represents:

- 1. The Debtor is in an active Chapter 13 bankruptcy..
- 2. The Debtor receives regular income from employment with Kaiser Permanete which may be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
- 3. The likelihood of success in this case will increase if the Motion for Wage Attachment is granted.

WHEREFORE, the Debtor respectfully requests this Court enter an Order directing the above-mentioned employer to Pay Trustee in the amount set forth in the attached Order.

Date: March 1, 2021 Respectfully Submitted,

> By: /s/ Dawn M. Cutaia Supreme Court ID 77965 Attorney for Debtor 115 East Philadelphia Street York, PA 17401 717-304-1841

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Desc

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ORDER TO PAY TRUSTEE

AND NOW, upon consideration of the above-referenced Debtor having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS HEREBY ORDERED that until further Order of this Court:

Employer: Kaiser Permanete National Payroll Service

2701 NW Vaught Street

Suite 490

Portland, OR 97201 Employee# 00449492

Shall deduct from Angelea Michelle Jones income the sum of \$346.00 each bi-weeekly pay, beginning with the first pay in March, 2021, and deduct this same amount each pay thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and remit the deducted sums to:

> Chapter 13 Trustee PO Box 7005 Lancaster PA 17604

IT IS FURTHER ORDERED that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

By the Court